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Of Counsel

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American Small Business League

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

American Small Business League

11 Plaintiff,

12 v.

13 United States Small Business Administration

14 Defendant.

Case No. C 08-0829 MHP

Declaration of Robert Belshaw, Stipulation and
Application re Extension of Time to File Motion
for Attorneys Fees; Proposed Order

15
16 DECLARATION

17 I, Robert Belshaw, declare:

18
19 I am attorney of record for plaintiff ASBL in this matter. ASBL intends to file a
20 motion for attorney's fees. I have calculated the due date for filing such a motion as September 9,
21 2008, per FRCP 54. I am a solo practitioner and prepare all of my own documents. As the result
22 of a very recent injury to my right hand I am unable complete the motion and supporting papers
23 by the current due date, or complete the calculations required for a meaningful discussion with
24 opposing counsel as required by local rule.

25
26 Counsel for Defendant has graciously consented to extend the deadline for filing the
27 motion for a period of two weeks, until September 23, 2008. No party will be prejudiced by an
28 order extending the deadline for filing the fee motion.

GUTIERREZ & ASSOCIATES
244 CALIFORNIA STREET, SUITE 300
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: September 8, 2008

/s/ Robert E. Belshaw

3 Robert E. Belshaw

4 STIPULATION

5 The parties hereto, through their respective counsel, stipulate that Plaintiff shall have a
6 two week extension of time until September 23, 2008 in which to file a motion for attorney's fees.
7

8 Dated September 8, 2008

/s/ Robert Belshaw

9 Robert E. Belshaw

10 Attorney for American Small
Business League

11 Dated: September 8, 2008

/s/

12 Melanie L. Proctor

13 Assistant United States Attorney

14 Attorneys for Defendants

15 PROPOSED ORDER

16 Pursuant to stipulation, IT IS SO ORDERED. Plaintiff shall have until September 23, 2008
17 to file its motion for attorney's fees.
18

19 Dated: _____

20 Hon. Marilyn H. Patel

21 United States District Court Judge